

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

MICHELLE WALLS, on behalf of herself
and all others similarly situated; and N.W., a
minor child, by his parent and general
guardian Michelle Walls, on behalf of
himself and all others similarly situated,

Plaintiffs,

v.

BEECH-NUT NUTRITION COMPANY;
THE HAIN CELESTIAL GROUP, INC.;
NURTURE, INC. D/B/A HAPPY FAMILY
ORGANICS; GERBER PRODUCTS
COMPANY; and PLUM PBC.,

Defendants.

Case No. 1:21-cv-870-DG-SJB

**STIPULATION AND CONSENT ORDER
EXTENDING TIME TO ANSWER, MOVE OR
OTHERWISE RESPOND TO PLAINTIFFS'
COMPLAINT**

**STIPULATION AND CONSENT ORDER EXTENDING TIME TO ANSWER, MOVE
OR OTHERWISE RESPOND TO PLAINTIFFS' COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and among the attorneys for Plaintiffs, Michelle Walls, on behalf of herself and all others similarly situated; and N.W., a minor child, by his parent and general guardian Michelle Walls, on behalf of himself and all others similarly situated ("Plaintiffs"), and defendant Plum, PBC. ("Plum") that Plum's time to answer, move or otherwise respond to the Complaint is hereby extended to May 24, 2021.

Pursuant to Section I.F. of this Court's Individual Practice Rules, the parties state as follows:

- (1) Plaintiffs filed the Complaint on February 17, 2021 (Dkt. No. 1);
- (2) Plaintiffs served the summons and Complaint on Plum on March 3, 2021, which set Plum's deadline to answer, move or otherwise respond to Plaintiff's Complaint for March 24, 2021 (Dkt. No. 11);

(3) Plaintiffs and Plum have met and conferred and Plaintiffs consent to extend the time by which Plum must answer, move or otherwise respond to Plaintiffs' Complaint by 60 days to May 24, 2021, to allow Plum additional time to evaluate the claims in Plaintiffs' Complaint and formulate a response.

(4) This is Plum's first request for an extension of time, and the extension will not affect any pending deadlines set by Court order. Comparable extensions have been granted already to other defendants.

WHEREFORE, the parties agree, subject to an Order from the Court, to extend Plum's time to answer, move, or otherwise respond to the Complaint to May 24, 2021.

Dated: March 16, 2021

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Attorney for Defendant Plum, PBC.

SO ORDERED

This ____ day of _____, 2021

Hon. Diane Gujarati, U.S.D.J.